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ZHUHAI DINGFU PHASE I INDUSTRIAL  
ENERGY CONSERVATION INVESTMENT  
FUND, LP

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION**

ZHUHAI DINGFU PHASE I  
INDUSTRIAL ENERGY  
CONSERVATION INVESTMENT  
FUND, LP, a Chinese limited  
partnership,

Petitioner,

v.

PHILLIP LIANG ZHANG aka ZHANG  
PHILLIP LIANG, aka LIANG ZHANG,  
aka ZHANG LIANG, aka PHILLIP  
CHANG, aka PHILLIP L CHANG; aka  
PHILLIP CHENG, an individual,

Respondent.

Case No. 8:23-cv-02059-MRA-JDE

**DECLARATION OF OSCAR A.  
FIGUEROA IN SUPPORT OF  
PETITIONER'S RENEWED  
OPPOSED *EX PARTE*  
APPLICATION FOR ORDER  
APPOINTING TEMPORARY  
RECEIVER AND ORDER TO  
SHOW CAUSE WHY A  
PERMANENT RECEIVER  
SHOULD NOT BE APPOINTED**

Hon. Mónica Ramírez Almadani

Petition Filed: November 1, 2023

Discovery Cut-Off: N/A  
Pre-Trial Conference Date: N/A  
Trial Date: N/A

**DECLARATION OF OSCAR A. FIGUEROA**

I, Oscar A. Figueroa, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California. I am an associate in the law firm of ArentFox Schiff LLP, counsel of record for Petitioner Zhuhai Dingfu Phase I Industrial Energy Conservation Investment Fund, LP (“Petitioner”). This declaration is made upon my personal knowledge, and if called and sworn as a witness, I could and would testify competently thereto. This declaration is submitted in support of Petitioner’s Renewed Opposed *Ex Parte* Application for Order Appointing Temporary Receiver and Order to Show Cause Why a Permanent Receiver Should Not be Appointed (the “Application”).

2. Through the bank levy process, Petitioner learned that on January 28, 2025, two weeks after the Court granted the Petition (Dkt. 45), Respondent Phillip L. Zhang closed his individual and joint bank accounts with his wife, Julie Cheng, at Cathay Bank. Petitioner is unaware what Zhang did with the funds withdrawn from these accounts, because Petitioner has not disclosed the accounts where the money was moved. This evasion directly obstructed Petitioner’s ability to levy Cathay Bank, while other accounts named after trusts and businesses, but still identified by Cathay Bank as connected to Zhang, lie beyond the scope of this Court’s Writ of Execution at these same institutions. Petitioner believes that Zhang is or has engaged in similar practices at the other banks Petitioner has levied.

3. On January 21, 2025, Petitioner served interrogatories and requests for production of documents on Zhang. A true and correct copy of Zhang’s interrogatories is attached hereto as **Exhibit 1**. A true and correct copy of Zhang’s requests for production of documents is attached hereto as **Exhibit 2**.

4. On February 7, 2025, Zhang’s counsel, Leodis Matthews, sent a letter concerning ongoing discovery disputes. A true and correct copy of the February 7th letter is attached hereto as **Exhibit 3**.

5. On February 13, 2025, affidavits were submitted to the Orange County

1 Clerk-Recorder's Office reflecting a change in trustee of Zhang's Family Trust. A  
2 true and correct copy of the affidavits submitted to the Orange County Clerk-  
3 Recorder's Office is attached hereto as **Exhibit 4**.

4 6. On April 14, 2025, Judge Almadani held a hearing on Zhang's Motion  
5 to Stay (Dkt. 49) and Motion to Amend (Dkt. 50). A true and correct copy of excerpts  
6 from transcript of the April 14th Hearing is attached hereto as **Exhibit 5**.

7 7. On May 1, 2025, Zhang served responses to Petitioner's special  
8 interrogatories and responses to Petitioner's requests for production. A true and  
9 correct copy of Zhang's responses to Petitioner's special Interrogatories dated May  
10 1, 2025, is attached hereto as **Exhibit 6**. A true and correct copy of Zhang's responses  
11 to Petitioner's requests for production dated May 1, 2025, is attached hereto as  
12 **Exhibit 7**.

13 8. On June 4, 2025, Mr. Matthews sent an email regarding discovery where  
14 he asserted that Zhang did not have an interest in accounts belonging to his Family  
15 Trust. A true and correct copy of Mr. Matthews' June 4th email is attached hereto as  
16 **Exhibit 8**.

17 9. A true and correct copy of an August 27, 2020 "Loan Agreement"  
18 between the Family Trust of Phillip Liang Zhang and Julie Xingzhou Cheng and  
19 JCAE Group, Inc. is attached hereto as **Exhibit 9**. This exhibit is being submitted  
20 under seal.

21 10. A true and correct copy of a May 31, 2024 "Loan Agreement" between  
22 the Family Trust of Phillip Liang Zhang and Julie Xingzhou Cheng and JCAE Group,  
23 Inc. is attached hereto as **Exhibit 10**. This exhibit is being submitted under seal.

24 11. A true and correct copy of a September 23, 2024 "Loan Agreement"  
25 between the Family Trust of Phillip Liang Zhang and Julie Xingzhou Cheng and  
26 JCAE Group, Inc. is attached hereto as **Exhibit 11**. This exhibit is being submitted  
27 under seal.

28 12. A true and correct copy of an April 10, 2021 Capital Contribution

1 Statement is attached hereto as **Exhibit 12**. This exhibit is being submitted under  
2 seal.

3 13. A true and correct copy of Capital Contribution Statements dated  
4 October 20, 2024, October 30, 2024, December 2, 2024, December 17, 2024, and  
5 January 9, 2025 are attached hereto as **Exhibit 13**. This exhibit is being submitted  
6 under seal.

7 14. A true and correct copy of JCAE Group, Inc.'s Balance Sheet and Profit  
8 & Loss Statement is attached hereto as **Exhibit 14**. This exhibit is being submitted  
9 under seal.

10 15. A true and correct copy of Zhang's Bank of America account statement  
11 for December 12, 2024 to January 13, 2025 is attached hereto as **Exhibit 15**. This  
12 exhibit is being submitted under seal.

13 16. On June 25, 2025, my colleague, Matthew Mock, received an email  
14 from Charles C.H. Wu indicating that his firm represents Julie Cheng. Another email  
15 was received by Andrew M. Sussman indicating that he and his firm represent  
16 William Cheng and Central Irvine Investment LLC. A true and correct copy of these  
17 emails is attached hereto as **Exhibit 16**.

18 17. A true and correct copy of proposed receiver Theodore Lanes'  
19 curriculum vitae is attached hereto as **Exhibit 17**.

20 18. A true and correct copy of proposed receiver Theodore Lanes' Oath of  
21 Receiver is attached hereto as **Exhibit 18**.

22 19. On June 26, 2025, at 11:32 a.m., my colleague, Matthew Mock, emailed  
23 Mr. Matthews to give notice of our intent to file the instant Application and offered  
24 a time for a phone call to discuss further. Mr. Matthews' contact information is  
25 below:

- 26 • Leodis C. Matthews
- 27 Zhong Lun Law Firm
- 28 4322 Wilshire Boulevard, Suite 200

1 Los Angeles, CA 90010

2 [leodismatthews@zhonglun.com](mailto:leodismatthews@zhonglun.com)

3 Phone: 323.930.5690

4 20. Mr. Matthews responded at 12:54 p.m. indicating that Zhang would  
5 oppose Petitioner's Application.

6 21. On the same day, at 11:41 a.m., Mr. Mock also emailed Mr. Charles  
7 C.H. Wu, counsel for Julie Cheng, to similarly give notice of our intent to file the  
8 Application and offered a time for a phone call to discuss. Mr. Wu's contact  
9 information is below:

- 10 • Charles C.H. Wu
- 11 Wu & Reddy, APC
- 12 98 Discovery
- 13 Irvine, CA 92618
- 14 [cchwu@wclawyers.com](mailto:cchwu@wclawyers.com)
- 15 Phone: 949.251.0111

16 22. Mr. Wu responded at 12:38 p.m. indicating that Julie Cheng would  
17 oppose Petitioner's Application. A call to discuss the issues further was scheduled  
18 for 2:30 p.m. Mr. Wu confirmed that Julie Cheng would oppose Petitioner's  
19 Application.

20 23. Similarly, at 11:49 a.m., Mr. Mock also emailed Andrew M. Sussman,  
21 counsel for William Cheng, to give notice of our intent to file the Application and  
22 offered a time to discuss further. Mr. Sussman's contact information is below:

- 23 • Andrew M. Sussman
- 24 WHGC PLC
- 25 1301 Dove St., Suite 1050
- 26 Newport Beach, CA 92660
- 27 [andrewsussman@whgclaw.com](mailto:andrewsussman@whgclaw.com)
- 28 Phone: 866.970.0186



*Zhuhai Dingfu Phase I Industrial Energy Conservation Investment Fund, LP, v.  
Phillip Liang Zhang  
8:23-CV-02059-MRA-JDE*

**PROOF OF SERVICE**

I am a citizen of the United States. My business address is ArentFox Schiff LLP, 555 S. Flower St., 43rd Floor, Los Angeles, California 90071. I am employed in the County of Los Angeles where this service occurs. I am over the age of 18 years, and not a party to the within cause.

On the date set forth below, according to ordinary business practice, I served the foregoing document(s) described as:

**DECLARATION OF OSCAR A. FIGUEROA IN SUPPORT OF  
PETITIONER'S RENEWED OPPOSED *EX PARTE* APPLICATION FOR  
ORDER APPOINTING TEMPORARY RECEIVER AND ORDER TO  
SHOW CAUSE WHY A PERMANENT RECEIVER SHOULD NOT BE  
APPOINTED**

- ☒ (BY E-MAIL) On this date, I personally transmitted the foregoing document(s) via my electronic service address (katryn.smith@afslaw.com) to the e-mail address(es) of the person(s) on the attached service list.
- ☐ (BY MAIL) I am readily familiar with my employer's business practice for collection and processing of correspondence for mailing with the U.S. Postal Service, and that practice is that correspondence is deposited with the U.S. Postal Service the same day as the day of collection in the ordinary course of business. On this date, I placed the document(s) in envelopes addressed to the person(s) on the attached service list and sealed and placed the envelopes for collection and mailing following ordinary business practices.
- ☐ (BY PERSONAL SERVICE) On this date, I caused to be delivered by hand envelope(s) containing the document(s) to the persons(s) on the attached service list.
- ☐ (BY FEDERAL EXPRESS) I electronically served the foregoing document(s) through Federal Express on the person(s) on the attached service list.
- ☒ (Federal) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

***Please see attached Service List.***

Executed on June 30, 2025, at West Grove, California.

  
\_\_\_\_\_  
Katryn F. Smith



Service List

Leodis C. Matthews Attorneys for Phillip Liang Zhang  
Zhong Lun Law Firm  
4322 Wilshire Boulevard, Suite 200 [leodismatthews@zhonglun.com](mailto:leodismatthews@zhonglun.com)  
Los Angeles, CA 90010 Phone: 323.930.5690

Charles C.H. Wu, Esq. Attorneys for Julie Cheng  
Vikram Reddy [cchwu@wclawyers.com](mailto:cchwu@wclawyers.com)  
WU & REDDY, APC. [vreddy@wclawyers.com](mailto:vreddy@wclawyers.com)  
98 Discovery  
Irvine, CA 92618 Phone: (949) 251-0111

Andrew M. Sussman Counsel for William Cheng and  
WHGC PLC Central Irvine Investment LLC  
1301 Dove St., Suite 1050  
Newport Beach, CA 92660 [andrewsussman@whgclaw.com](mailto:andrewsussman@whgclaw.com)  
[JeffreyWang@WHGCLaw.com](mailto:JeffreyWang@WHGCLaw.com)  
[SuchenLuo@WHGCLaw.com](mailto:SuchenLuo@WHGCLaw.com)  
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